

# EXHIBIT B

Wayne Van Scoy

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1                   IN THE UNITED STATES DISTRICT COURT  
2                                   OF DELAWARE

3                                   -- -- --  
4       WAYNE VAN SCOY                                   : C.A. NO. 05-108 (KAJ)  
5                                   :                                   :  
6                   vs.                                   :                                   :  
7       VAN SCOY DIAMOND MINE OF :  
8       DELAWARE, INC., KURT VAN :  
9       SCOY and DONNA VAN SCOY :  
10                                   -- -- --

11  
12                   Oral deposition of WAYNE VAN SCOY,  
13       taken on behalf of the Defendant, in the Law  
14       Offices of BURKE & BURKE, 1460 Wyoming Avenue,  
15       Forty Fort, Pennsylvania, on Tuesday, October 4,  
16       2005, commencing at or about 11:40 a.m., before  
17       Patricia A. Lipski, Registered Professional  
18       Reporter - Notary Public.

19                                   -- -- --  
20                   LOVE COURT REPORTING, INC.  
21                                   1500 Market Street  
22                                   12th Floor, East Tower  
23                   Philadelphia, Pennsylvania 19102  
24                                   (215) 568-5599

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1 Q. You seem to have a pretty strong opinion that  
2 the operation of Kurt's store creates confusion?

3 A. For sure with the internet coming over, yes,  
4 absolutely.

5 Q. Let's say without the internet. Does that  
6 confusion remain?

7 A. If Alan goes down and opens a store down  
8 there, it's going to be confusing, yes.

9 Q. Okay.

10 What evidence does Rings of Romance have  
11 that Van Scoy Diamond Mine is famous up and down  
12 the East Coast?

13 MR. PETOCK: Can you read that question  
14 back.

15 (Whereupon the court reporter read back  
16 as follows: "Q. Okay.

17 What evidence does Rings of Romance have  
18 that Van Scoy Diamond Mine is famous up and  
19 down the East Coast?")

20 THE WITNESS: Meaning me?

21 BY MR. QUINN:

22 Q. You, as president of Rings of Romance, you  
23 mentioned on a few occasions they're known up and  
24 down the East Coast. How do you know that?

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1 A. Stores that were leasing the name, the mark,  
2 up and down the East Coast, the stock car racing  
3 that was advertised, internationally on TV, and re-  
4 shown on races. That goes across the country.

5 Q. When were those races shown, what years?

6 A. God, they might fall back -- they might even  
7 be playing currently sometimes. You see a race,  
8 like you remember that race. It was in 1968. Look  
9 at those cars and stuff. I don't know for sure.  
10 I'm sure it has. It's in the history books.

11 Q. The history books?

12 A. Yes. Of stock car racing, the history. It's  
13 just in the history. Winston Cup Series and stuff.

14 MS. MORGAN: Can we take a couple  
15 minutes?

16 (Whereupon a recess was held.)

17 BY MS. MORGAN:

18 Q. We're almost done. I have a couple more  
19 questions and we'll wrap this up.

20 We were talking a little bit before  
21 about the notoriety along the East Coast of Van  
22 Scoy Diamond Mine.

23 Did you ever take a survey of how -- of  
24 the notoriety of that mark along the East Coast or